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Attorneys for USACM Liquidating Trust

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re:

USA Commercial Mortgage Company,
Debtors

Case No. BK-S-06-10725-LBR

CHAPTER 11

**Stipulation re Proofs of Claim Filed By
Daniel D Newman Trust DTD 11/1/92**

Date of Hearing: September 30, 2011

Time of Hearing: 9:30 a.m.

USACM Liquidating Trust (the “USACM Trust”), by and through its counsel, Lewis and Roca LLP, and Daniel D Newman Trust DTD 11/1/92 (“Newman”) by and through its Trustee Daniel Newman, represent to the Court as follows:

USACM Liquidating Second Omnibus Objection of USACM Trust To Proofs Of Claim
Based In Part Upon Investment In The Bundy Canyon (\$5 Million) Loan [DE 8753] (the
“Objection”) was filed with the Court on July 27, 2011. Newman sent an email response
to counsel for the trustee in response to the Trust’s Objection. (the “Response”) on August
9, 2011.

The claim is based upon investments in multiple loans, including three loans that are now subject of objections by the USACM Trust that are on for hearing on September 30, 2011:

Loan Name	Amount of Investment
HFAH Clear Lake	\$70,000.00
Bundy Canyon \$5,000,000.00	\$90,000.00
Castaic Partners III	\$60,000.00



1 The objections now at issue with regard to the Newman claims are the Fourth
2 Omnibus objection re HFAH Clear Lake Objection [DE 8894] and no response filed, the
3 Second Omnibus Objection re Bundy Canyon (\$5 Million) Objections [DE 8753] and
4 Newman's e-mail response, the Third Omnibus Objection re Castaic Partners III Objection
5 [DE 8848] and no response filed.

6 The HFAH Clear Lake Objection is currently on the Court's calendar for
7 September 30, 2011 as item No. 52. The Bundy Canyon \$5,000,000.00 Objection is
8 currently on the Court's calendar for September 30, 2011 as item No. 66. The Castaic
9 Partners III Objection is currently on the Court's calendar for September 30, 2011 as item
10 No. 40. The parties wish to continue these hearings as to the Newman claims only to
11 November 15, 2011 at 9:30 a.m.

12 The parties request the proceedings related to the three objections listed above be
13 consolidated and scheduled for a single hearing on November 15, 2011 at 9:30 a.m., which
14 is an omnibus hearing date. The USACM Trust requests that this court should not sustain
15 these aforementioned Objections as they relate to Newman only.

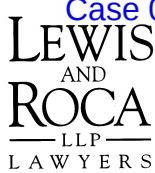
16 In the interim, the parties will attempt to negotiate a settlement and, if necessary,
17 proceed to mediation.

18 STIPULATED

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20 LEWIS AND ROCA LLP

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22 By /s/ John Hinderaker (AZ 18024)
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2
3 DANIEL D. NEWMAN
4

5 /s/ Daniel D. Newman
6 Daniel D. Newman
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